

REED SMITH LLP

Formed in the State of Delaware

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

LORETTA THOMAS and
FRANKLIN THOMAS,

Plaintiffs,

v.

WELLS FARGO BANK, N.A.,
ZUCKER, GOLDBERG &
ACKERMAN, LLC,

Defendants.

Civil Action No.
2:15-cv-00871-CCC-MF

*Motion Returnable:
September 8, 2015*

**NOTICE OF DEFENDANT'S
MOTION TO DISMISS
PLAINTIFF'S AMENDED
COMPLAINT WITH PREJUDICE**

TO: Loretta Thomas
Franklin Thomas
279 Seaview Avenue
Jersey City, New Jersey 07092
Pro Se Plaintiffs

PLEASE TAKE NOTICE THAT on August , 2015, at 9:00 a.m., or as soon thereafter as counsel may be heard, counsel for Defendant Wells Fargo Bank,

N.A. shall move before the Honorable Claire C. Cecchi, U.S.D.J., at the Federal District Court for the District of New Jersey located at the Martin Luther King, Jr. Federal Building and U.S. Courthouse, 50 Walnut Street, Newark, NJ 07101 on a Motion to Dismiss Plaintiffs' Amended Complaint with Prejudice.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendant shall rely on the attached Memorandum of Law and Certification of Laura K. Conroy, Esq., with exhibits submitted herewith.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order granting Defendant's Motion to Dismiss Plaintiffs' Amended Complaint is enclosed herewith.

REED SMITH LLP
Attorneys for Defendant

By: s/ Laura K. Conroy.
Laura K. Conroy

Dated: July 27, 2015